SPEISER KRAUSE

COUNSELLORS AT LAW

800 Westchester Avenue
Suite South 608
Rye Brook, New York 10573

PHONE: (914) 220-5333 FAX: (914) 220-5334

WWW.SPEISERKRAUSE.COM

5555 GLENRIDGE CONNECTOR
SUITE 550
ATLANTA, GA 30342
T: (404) 751-0632
F: (866) 936-6382

2617 HUNTINGDON PIKE
SUITE 101
HUNTINGDON VALLEY, PA 19006
T: (215) 884-8190
F: (215) 884-8266

70
years June 16, 2023

VIA ECF
Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, New York 10007

> **Re:** ***In Re Terrorist Attacks of September 11, 2001***
> ***03 MDL 1570***
> ***02 CV 6977, Ashton v. Al Qaeda, et al.***
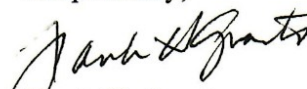> ***02 CV 7230, Burlingame v. Bin Laden, et al.***

Dear Judge Netburn,

We write in response to the Court's Order of June 15, 2023, at ECF 9126, seeking clarification regarding the Burlingame Plaintiffs' motion for default judgment at ECF 8737, 8738 and 8739. In light of the Court's subsequent Order at ECF 8973, Plaintiffs can confirm that: (1) they wish to withdraw their motion to the extent it seeks judgment on behalf of non-citizen Plaintiffs at Exhibit A-2 and, with the Court's permission, refile a separate motion on behalf of those non-citizen Plaintiffs which includes the additional information described in the Court's Order at ECF 8973; and (2) as a result of the dismissal of Muhammad Omar, the remaining Plaintiffs at Exhibit A-1 seek judgment against only the Taliban at this time.

We can also confirm that the corrections suggested by the Court at paragraphs one through eight on page 2 of ECF 9126 are all accurate and respectfully request that the Court adopt each of the recommended corrections in its adjudication of Plaintiffs' motion. Should the Court decide that an amended exhibit would be helpful we can promptly file an amended exhibit in place of ECF 8738-1.

We apologize for the errors and any inconvenience this may have caused. If the Court should need any additional information, please contact the undersigned. Thank you and best regards.

Respectfully,

Frank H. Granito

ADDITIONAL OFFICE LOCATIONS: GARDEN CITY, NY AND METROPOLITAN DC